

Exhibit I



Farhang Heydari <farhang@nsbcivilrights.com>

Indemnification in Allen v. City of St. Louis, 14-cv-1398 (E.D. Mo.)

Farhang Heydari <farhang@nsbcivilrights.com>

Wed, May 4, 2016 at 5:59 PM

To: McDonnellT@stlouis-mo.gov

Cc: Nick Brustin <nick@nsbcivilrights.com>, "Weiss, Charles" <caweiss@bryancave.com>, Emma Freudenberger <emma@nsbcivilrights.com>, "Gado, Ameer" <aagado@bryancave.com>, Vishal Agraharkar <vishal@nsbcivilrights.com>, Colin Lubelczyk <colin@nsbcivilrights.com>

Mr. McDonnell,

Now that we understand the City's position on indemnification, please let us know what the City's position is regarding its duty to defend the individual defendant officers, as well as the basis for the City's position.

In your response, please let us know whether the City's position on its duty to defend is different for current employees or former employees, and whether the City's position is different should the State be disqualified from representing any or all of the individual defendants.

We ask that you respond as soon as possible, but in any event no later than May 10, so that we may have adequate time to address this issue, if needed, in the briefing ordered by Judge Sippel. If we do not hear from you by this date, we will assume that the City's position is that it has no duty to defend any of these defendants under any circumstances.

Thank you,
Farhang

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Farhang Heydari
Neufeld Scheck & Brustin, LLP
99 Hudson St., 8th Floor | NYC 10013
T: (212) 965-9081 | F: (212) 965-9084
www.nsbcivilrights.com

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